

IN THE MATTER OF APPLICATION)
OF DELMARVA POWER & LIGHT)
COMPANY TO CHANGE THE)
METHODOLOGY FOR THE)
CALCULATION OF BALANCING FEES)
ASSOCIATED WITH THE GAS COST RATE)
(Filed February 3, 2015)

PSC DOCKET NO. 15-0671

**PETITION FOR LEAVE TO INTERVENE
OF
CALPINE MID-ATLANTIC ENERGY, LLC**

Calpine Mid-Atlantic Energy, LLC (“Calpine”), by and through its undersigned counsel and pursuant to Rule 21 of the Delaware Public Service Commission’s Rules of Practice and Procedure, respectfully petitions for leave to intervene as a party in this matter.

In support of this Petition, Calpine states as follows:

1. Calpine’s contact information, as contemplated by Rule 21(a)(i) of the Rules of Practice and procedure, is as follows:

Stuart Widom, Director, Government and Regulatory Affairs
Calpine Corporation
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
E-mail: stuart.widom@calpine.com
Phone: 302-468-5324
Fax: 302-468-5401

C. David Lamoreaux
Regional Managing Counsel
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
E-mail: david.lamoreaux@calpine.com
Phone: 302-468-5318
Fax: 302-468-5401

2. Calpine has an interest in the outcome of the proceeding. Delmarva Power & Light Company (“Delmarva”) has filed an application to change the methodology for the calculation of balancing fees associated with the gas cost rate. Calpine, operating

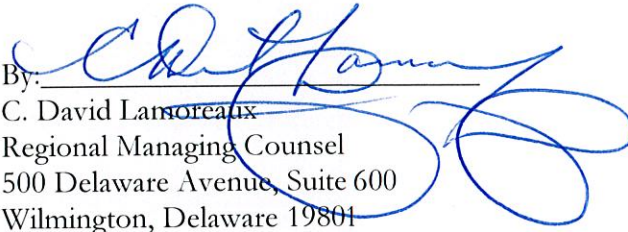
through one or more subsidiaries, is the largest electric power generator and natural gas user in the state of Delaware, and sells electricity on a wholesale basis in the state and throughout the PJM region in which Delmarva operates. In connection with these operations, Calpine (through its affiliates) has contractual arrangements with Delmarva for certain gas pipeline services, including balancing services, related to the Claymont to Hay Road Pipeline. Matters being considered in connection with Delmarva's application in this Docket may have an impact on the charges and fees paid by Calpine in respect of those services.

3. The interests of Calpine would be inadequately represented in this Docket in the absence of Calpine's intervention as no other party to the proceedings has specific knowledge of Calpine's operations sufficient to address issues that may be relevant to Calpine as a generator and supplier of electricity in the state of Delaware and the PJM region, and a recipient of related pipeline services from Delmarva.
4. Accordingly, Calpine's interests in this proceeding will not be adequately represented without being granted intervenor status, and the public interest will be served by Calpine's participation as a party to this proceeding.

WHEREFORE, Petitioner respectfully requests that it be granted leave to intervene in this proceeding as a party for all purposes.

Respectfully submitted,

CALPINE MID-ATLANTIC ENERGY, LLC

By: 
C. David Lamoreaux
Regional Managing Counsel
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
E-mail: david.lamoreaux@calpine.com
Phone: 302-468-5318
Fax: 302-468-5401

Dated: April 16, 2015

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2015, I filed the attached Petition of Calpine Mid-Atlantic Energy, LLC for Leave to Intervene with the Public Service Commission.

CALPINE MID-ATLANTIC ENERGY, LLC

By: 

C. David Lamoreaux

Regional Managing Counsel

500 Delaware Avenue, Suite 600

Wilmington, Delaware 19801

E-mail: david.lamoreaux@calpine.com

Phone: 302-468-5318

Fax: 302-468-5401